

FILED
IN CLERKS OFFICE
APR 22 2015
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
FILED UNDER SEAL

UNITED STATES OF AMERICA,)
)
 v.) CRIMINAL NO. 13-10200-GAO
)
 DZHOKHAR TSARNAEV)

**SEALED MOTION TO SEAL DEFENDANT'S RESPONSE TO
GOVERNMENT'S MOTION IN LIMINE TO EXCLUDE PENALTY-PHASE
EXPERT TESTIMONY AND RELATED EXHIBITS**

Defendant moves that the Court grant the instant motion and the attached Defendant's Motion to Exclude Inflammatory, Cumulative, and Late-Disclosed Government Exhibits under seal. The request to seal is made according to the Court's practice of treating objections to sensitive non-public information at sidebar, and we leave any decision regarding public disclosure to the Court's discretion.

Respectfully submitted,
DZHOKHAR TSARNAEV

By his attorneys



DAVID I. BRUCK
JUDY CLARKE
MIRIAM CONRAD
WILLIAM FICK
TIMOTHY WATKINS
Attorneys for Dzhokhar Tsarnaev

DATED: April 22, 2015

Certificate of Service

I hereby certify that this document was served by email on April 22, 2015 upon counsel for the government.



A handwritten signature in blue ink, appearing to read "Paul F. Rin", is written over a horizontal line.